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June 27, 2025

VIA EMAIL

Hon. Victoria Reznik
United States Magistrate Judge
Southern District of New York

**Re: *The Wave Studio, LLC v. General Hotel Management Ltd et al.*,
SDNY Case No. 7:13-cv-09239-CS-VR**

Dear Judge Reznik:

My firm represents and I am counsel of record for defendant Setai Owners LLC (“Setai”). I write pursuant to Your Honor’s June 20, 2025 order (ECF 529) directing all defendants to respond to the issues raised in Plaintiff’s June 18, 2025 letter (“Plaintiff’s Letter”) (ECF 528). Plaintiff’s Letter addresses several issues, including: (1) the status of the “Master Complaint”; (2) co-defendants’ responses to the Master Complaint; (3) Plaintiff’s requests to certain parties that they appear in the action; and (4) settlement. The second and third of these do not concern Setai. We therefore address only the first and fourth.

Regarding the “Master Complaint,” Setai’s understanding, both at the time of the November 29, 2023 status conference at which the concept was introduced and since then, is that the Master Complaint is the operative pleading. Regarding settlement, Setai remains open to discussion of settlement. Regarding the timing of a status conference, Setai takes no position at this time.

Respectfully submitted,

GOLDBERG SEGALLA LLP

/s/ Matthew S. Trokenheim

Matthew S. Trokenheim

MST:

Cc: All counsel of record (via ECF)

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